

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No. 1:18-cv-507**

**KATHRYN MCHUTCHISON,**

**Plaintiff,**

**v.**

**SPENCER SCHAR,**

**Defendant.**

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**BRIEF IN SUPPORT OF JOINT  
MOTION FOR ENTRY OF  
PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, and for the reasons stated in the corresponding Joint Motion for Entry of Protective Order, Plaintiff Kathryn McHutchison (“Plaintiff”) and Defendant Spencer Schar (“Defendant,” collectively, the “Parties”) respectfully request that the motion be granted. The Parties submit this Joint Motion for good cause and in the interests of justice to facilitate discovery in this matter.

WHEREFORE, the Parties respectfully request that the Joint Motion for Entry of Protective Order be GRANTED, and that the Court review the Parties’ Proposed Protective Order (attached to the Joint Motion as **Exhibit A**) and competing proposals from the parties for Paragraphs 6(c) and 7, and thereafter enter a Protective Order in this action

This the 28<sup>th</sup> day of February, 2019.

/s/ John R. Taylor

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the date indicated below I electronically filed the foregoing document(s) with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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This the 28<sup>th</sup> day of February, 2019.

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